



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

May 25, 2007

RECEIVED

MAY 29 2007

BOARD OF HEALTH

Mr. Ned Therien, Health Policy Analyst
Washington State Board of Health
PO Box 47990
Olympia, WA 98504-7990

RE: Comments of Proposed Adoption of WAC 246-203-121, *Disposal of Dead Animals*

Dear Mr. Therien:

The Department of Ecology (Ecology) supports the adoption of WAC 246-203-121, *Disposal of Dead Animals*, by the Washington State Board of Health (BOH). Ecology and the Washington State Department of Agriculture (WSDA) have worked closely with BOH staff to draft this rule to ensure all agency rules for dead animal management are consistent.

In 2005, at the direction of the Washington State Legislature, Ecology drafted guidelines for composting bovine and equine mortalities. Ecology has confirmed composting to be an effective option for animal mortality management. In 2006, the State Legislature authorized WSDA to create rules for management of livestock carcasses. That rule was adopted by WSDA on May 1 of this year.

The overriding intent of these actions has been to eliminate regulatory conflict and to expand management options to include methods that have been developed since original requirements were created over 40 years ago. Ecology believes adoption of this rule will create consistency among the various rules applicable to animal carcass management.

Thank you for the opportunity to offer these comments.

Sincerely,

Chuck Matthews
Regional Solid Waste Specialist
Solid Waste & Financial Assistance Program

cc: Polly Zhem, Deputy Director, Ecology

